



**Testimony  
Leo Paul  
First Selectman, Town of Litchfield  
Environment Committee  
of the Connecticut General Assembly  
February 27, 2015**

Thank you for the opportunity to comment in **support of HB-5709** which would ensure that DEEP's MS4 General Permit does not impose considerable unfunded mandates on 49 smaller communities that are not required to be regulated under EPA's stormwater rules.

Our community supports efforts to protect water resources and provide a healthy and safe environment for our residents. However, DEEP's MS4 General Permit unnecessarily extends the permit requirements to small, rural communities without regard for cost or whether the permit requirements will address stormwater issues to improve water quality.

Complying with DEEP's MS4 General Permit will require a substantial investment of our town's limited resources. We would need to retain legal counsel to update land use regulations and draft new ordinances, hold town meetings, complete extensive reports, budget for new signs and facilities regarding pet waste and waterfowl management and develop a public education and outreach campaign.

All of these measures will be mandated under DEEP's MS4 General Permit even though the U.S. EPA does not require the state to cover non-urbanized areas such as Litchfield where stormwater runoff is not a significant issue. Given Connecticut's ongoing fiscal challenges, the state is in no position to assist municipalities in funding or providing guidance to towns in implementing the permit requirements. Once again, local property taxpayers will bear the burden. .

Moreover, DEEP has indicated that it has not analyzed data to determine whether the requirements under the existing MS4 General Permit have been successful in addressing water quality concerns associated with stormwater runoff. Before moving ahead with efforts to significantly expand the reach and requirements of the existing General Permit, DEEP should be required to step back and figure out what's working and what isn't working.

Instead, DEEP is looking to aggressively expand the scope of the General Permit to cover small towns - at considerable cost to property taxpayers - without conducting any cost-benefit analysis or even analyzing their own data. Given the fiscal challenges facing the state and municipalities, does this approach make any sense?

I urge your support for HB-5709 which will ensure that DEEP does not impose overreaching unfunded mandates on Connecticut's smaller communities.